

## **REMARKS/ARGUMENTS**

### *Claims*

The Examiner rejected claims 1-116. By this amendment, claims 1, 109, 113, and 116 have been amended, and claims 2-3, 5-6, 8-9, 11-12, 14-15, 17-18, 20-21, 23-24, 26-27, 29-30, 32-33, 35-36, 38-39, 41-42, 44-45, 47-48, 50-51, 53-54, 56-57, 59-60, 62-63, 65-66, 68-69, 71-72, 74-75, 77-78, 80-81, 83-84, 86-87, 89-90, 92-93, 95-96, 98-99, 101-102, 104-105, and 107-108 have been canceled. Therefore claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 31, 34, 37, 40, 43, 46, 49, 52, 55, 58, 61, 64, 67, 70, 73, 76, 79, 82, 85, 88, 91, 94, 97, 100, 103, 106, and 109-116 remain pending in the application.

### *Claim Rejections – 35 USC § 102*

Claims 1-116 were rejected under 35 USC 102(e) as being anticipated by Bourbonnais et al. (US Pat No 6,338,033). The rejection is respectfully traversed.

Bourbonnais discloses a network-based teletranslation system that includes a “server layer calling a plurality of filters in an appropriate order based on [a] translation request and existing parameters...” (Bourbonnais at col. 3, lines 4-6.) The filters of Bourbonnais are thus part of a machine translation system and exist independently of any specific electronic communication that requires translation. On the other hand, the present invention claims a translation information segment associated with an electronic communication. The translation information segment of the present invention is thus part of an electronic communication and exists independently of any specific machine translation system.

Bourbonnais thus teaches how to modify a machine translation system so as to improve translation performance; whereas the present invention teaches how to modify electronic communications so as to improve translation performance. Bourbonnais therefore teaches away from the claims of the present invention.

Bourbonnais discloses that “the distributed architecture of [Bourbonnais] provides a flexible and scalable way to utilize the computing power of computers in the network. In [Bourbonnais], multiple translation requests can be accepted from various sources on a network. The translation requests can be dispatched among

those computers that have been identified as having the necessary translation capabilities, i.e., available bandwidth, processing speed, etc.” (Bourbonnais at col. 10, lines 54-61.) Bourbonnais is therefore focused on enabling machine translation systems to be customized based on system capabilities and the needs of particular users.

However, the present invention focuses on ensuring that specific electronic communications are accurately translated based on the needs of the author or sender of the electronic communications. The present specification states: “The internet has taken the decision about what to translate out of an organization’s hands. If a user wants a translation, [he or she] can easily obtain one through a variety of cheap or free online translation sites. A challenge to organizations is to make sure the translation obtained from these online translation sites portrays the organization and/or its products and services in a favorable light. The TIS provides a conduit for an organization to expose its translation assets and resources for the purpose of allowing a user to obtain a more accurate translation that is more likely to portray the message sought by the organization.” (International Publication No. WO 02/067139 A1 at page 19, lines 4-12.)

The filters of Bourbonnais therefore enable a machine translation system to be modified at the time that a translation of an electronic communication is requested based on the needs of a requestor of the translation. The present invention enables an electronic communication to be modified well before a translation is requested based on the needs of an author or sender of the electronic communication.

The Applicant respectfully asserts that the examiner incorrectly associated the translation information segment of the present invention with the filters of Bourbonnais. Claim 2 of the present application stated “wherein the translation information segment is embedded in the electronic communication or attached to the electronic communication.” The examiner asserted that such claim is anticipated by Bourbonnais at col. 8, lines 15-21. But that passage refers to “a particular set of words supplied prior to or with the translation request”, and does not teach that the filters of Bourbonnais are themselves embedded in an electronic communication.

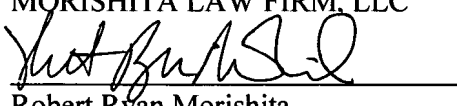
To clarify that the translation information segments of the present invention are associated with an electronic communication, and are not associated with a particular machine translation system, claim 1 has now been amended to include the limitation of claim 2 that states that the translation information segment is embedded in the electronic communication. Claims 2 and 3 and all related dependent claims have then been canceled. Similarly, the remaining independent claims have been amended to recite that the translation information segment is embedded in an electronic communication.

The applicant asserts that the rejections of the remaining dependent claims are now moot in light of the above amendments and arguments concerning the independent claims. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless the Applicant has argued herein that such amendment was made to distinguish over a particular reference.

If the Examiner believes that there are any informalities which can be corrected by an Examiner's amendment, or in the event that the Examiner deems the present application non-allowable, a telephone call to the undersigned is respectfully solicited.

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Date

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